

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO.</b> _____
<b>v.</b>	<b>:</b>	<b>DATE FILED:</b> _____
<b>NATAYA LLOYD</b>	<b>:</b>	<b>VIOLATIONS:</b>
	<b>:</b>	<b>18 U.S.C. § 1344 (bank fraud - 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 1028A (aggravated identity theft - 7 counts)</b>
	<b>:</b>	<b>18 U.S.C. § 1030 (use of a computer in connection with bank fraud - 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 2 (aiding &amp; abetting)</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

At all times material to this indictment:

1. Commerce Bank was a financial institution conducting business in the Eastern District of Pennsylvania and elsewhere, the deposits of which were insured by the Federal Deposit Insurance Corporation, certificate number 21140.
2. Defendant NATAYA LLOYD was employed as a teller for Commerce Bank at a branch located at Conshohocken, Pennsylvania, where she had access to the identity information of the bank's customers, including names, social security numbers, dates of birth, and account numbers, as well as account balance information.
3. From on or about May 22, 2008 to on or about June 6, 2008, in the Eastern District of Pennsylvania, defendant

**NATAYA LLOYD**

knowingly executed, attempted to execute, and aided and abetted the execution of, a scheme to defraud Commerce Bank, and to obtain monies owned by and under the care, custody and control of Commerce Bank by means of materially false and fraudulent pretenses, representations and promises.

### **THE SCHEME**

It was part of the scheme that:

4. From on or about May 22, 2008 to on or about June 6, 2008, defendant NATAYA LLOYD used her position with Commerce Bank to improperly acquire account information for Citizens Bank accounts belonging to L.R., R.T., A.S, P.J., C.T., C.F., and R.W.
5. Defendant LLOYD then gave that account information, including account numbers, to persons unknown to the grand jury, who used that information to fraudulently take and attempt to take approximately \$21,250 from Commerce Bank by withdrawing money from, and cashing fraudulent checks on, accounts belonging to L.R., R.T., A.S., P.J., C.T., C.F., and R.W.
6. In furtherance of the scheme, other individuals cashed the following counterfeit checks and made or attempted to make the following fraudulent withdrawals:

<u><b>DATE</b></u>	<u><b>LOCATION</b></u>	<u><b>VICTIM ACCOUNT HOLDER</b></u>	<u><b>AMOUNT</b></u>
05/26/08	Philadelphia, PA	L.R.	\$1,800
05/28/08	Pennsauken, NJ	R.T.	\$1,500
06/03/08	Conshohocken, PA	A.S.	\$3,800
06/03/08	Philadelphia, PA	A.S.	\$950
06/05/08	Philadelphia, PA	P.J.	\$900

06/02/08	Philadelphia, PA	C.T.	\$3,200
06/06/08	Philadelphia, PA	C.F.	\$900
06/06/08	Philadelphia, PA	C.F.	\$900
06/06/08	Philadelphia, PA	C.F.	\$900
06/06/08	Philadelphia, PA	C.F.	\$900
06/0606	Pennsauken, NJ	R.W	\$1,500 attempt

All in violation of Title 18, United States Code, Sections 1344 and 2.

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

From on or about May 22, 2008 to on or about May 26, 2008, in the Eastern  
District of Pennsylvania, defendant

**NATAYA LLOYD**

knowingly and without lawful authority, transferred, possessed and used, and aided and abetted  
the transfer, possession and use of, a means of identification of another person, that is, the name  
and identifying information of L.R., during and in relation to bank fraud.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5) and 2.

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

From on or about May 24, 2008 to on or about May 28, 2008, in the Eastern  
District of Pennsylvania, defendant

**NATAYA LLOYD**

knowingly and without lawful authority, possessed and used, attempted to use, and aided and  
abetted the use of, a means of identification of another person, that is, the name and identifying  
information of R.T., during and in relation to bank fraud.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5) and 2.

**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

From on or about May 31, 2008 to or about June 3, 2008, in the Eastern District of Pennsylvania, defendant

**NATAYA LLOYD**

knowingly and without lawful authority, possessed and used, attempted to use, and aided and abetted the use of, a means of identification of another person, that is, the name and identifying information of A.S., during and in relation to bank fraud.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5) and 2.

**COUNT FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

From on or about May 31, 2008 to on or about June 5, 2008, in the Eastern  
District of Pennsylvania, defendant

**NATAYA LLOYD**

knowingly and without lawful authority, possessed and used, attempted to use, and aided and  
abetted the use of, a means of identification of another person, that is, the name and identifying  
information of P.J., during and in relation to bank fraud.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5) and 2.

**COUNT SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

From on or about May 31, 2008 to on or about June 3, 2008, in the Eastern  
District of Pennsylvania, defendant

**NATAYA LLOYD**

knowingly and without lawful authority, possessed and used, attempted to use, and aided and  
abetted the use of, a means of identification of another person, that is, the name and identifying  
information of C.T., during and in relation to bank fraud.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5) and 2.



**COUNT SEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

From on or about June 3, 2008 to on or about June 7, 2008, in the Eastern District of Pennsylvania, defendant

**NATAYA LLOYD**

knowingly and without lawful authority, possessed and used, attempted to use, and aided and abetted the use of, a means of identification of another person, that is, the name and identifying information of C.F., during and in relation to bank fraud.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5) and 2.

**COUNT EIGHT**

**THE GRAND JURY FURTHER CHARGES THAT:**

From on or about June 3, 2008 to on or about June 6, 2008, in the Eastern District of Pennsylvania, defendant

**NATAYA LLOYD**

knowingly and without lawful authority, possessed and used, attempted to use, and aided and abetted the use of, a means of identification of another person, that is, the name and identifying information of R.W., during and in relation to bank fraud.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5) and 2.

**COUNT NINE**

**THE GRAND JURY FURTHER CHARGES THAT:**

From on or about May 22, 2008 to on or about June 3, 2008, in the Eastern  
District of Pennsylvania, defendant

**NATAYA LLOYD**

intentionally accessed a protected computer and exceeded authorized access, and thereby  
obtained information contained in a financial record of a financial institution, that is, Commerce  
Bank.

In violation of Title 18, United States Code, Section 1030(a)(2)(A).

## **NOTICE OF FORFEITURE**

1. As a result of the violations of Title 18, United States Code, Sections 371, 1344 and 1030, set forth in this indictment, defendant

### **NATAYA LLOYD**

shall forfeit to the United States of America any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such offenses, as charged in this indictment, including, but not limited to, the sum of \$18,250.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b),

incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 982(a)(2).

**A TRUE BILL:**

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**GRAND JURY FOREPERSON**

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**LAURIE MAGID**  
**UNITED STATES ATTORNEY**